TANASI LAW OFFICES 1 RICHARD E. TANASI, ESQ. Nevada State Bar No. 9699 2 8716 Spanish Ridge Ave., Suite 105 Las Vegas, NV 89148 3 p. 702-906-2411 f. (866) 299-5274 4 rtanasi@tanasilaw.com Attorney for Mario Castro 5 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 UNITED STATES OF AMERICA, Case No. 2:19-cr-00295-GMN-NJK 9 Plaintiff, 10 v. 11 STIPULATION AND ORDER TO CONTINUE DEADLINE TO OBJECT MARIO CASTRO 12 JOSE SALUD CASTRO TO REPORT AND SALVADOR CASTRO, **RECOMMENDATION ECF NO. 326** 13 MIGUEL CASTRO, AND (First Request) JOSE LUIS MENDÉZ, 14 Defendant. 15 16 IT IS HEREBY STIPULATED AND AGREED, by and between the United States of 17 America, by and through Timothy Finley, U.S. Department of Justice Trial Attorney, and 18 19 MARIO CASTRO, by and through his attorney, Richard E. Tanasi, Esq., that Defendant 20 Castro's deadline to Object to the Honorable Magistrate Judge Koppe's Report and 21 Recommendation ECF No. 326, now set for April 13, 2022 be vacated and continued to July 22 1, 2022, and that the government's deadline to respond be July 15, 2022. 23 /// 24 25 26 ///

This Stipulation is entered into for the following reasons:

- 1. On March 30, 2022, the Honorable District Court Judge Navarro continued the trial date and other pleading deadlines related to Defendant Castro to July 1, 2022. [ECF No. 325.]
- 2. Defendant Castro requests the July 1, 2022 deadline for all reasons outlined in his Motion to Continue. [ECF No. 316.] The government does not object to this request given the new trial Order in this case. The government requests two weeks to respond to any objection filed by the defendant, and thus requests that its deadline be set for July 15, 2022.
 - The additional time requested herein is not sought for purposes of delay. 3.
- 4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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1 2 WHEREFORE, the parties respectfully request that this Honorable Court accept the 3 Stipulation and enter an Order as set forth below, continuing Defendant Castro's deadline to 4 Object to the Honorable Magistrate Judge Koppe's Report and Recommendation ECF 5 No. 326 to July 1, 2022, and that the government's deadline to respond be July 15, 2022. 6 DATED this 1st day of April, 2022. 7 8 9 /s/ Timothy Finley CHRISTOPHER CHIOU 10 Acting United States Attorney MINA CHANG 11 Assistant United States Attorney 12 Office of the United States Attorney 501 South Las Vegas Blvd., Suite 1100 13 Las Vegas, Nevada 89101 Tel.: 702-388-6336 14 Mina.Chang@usdoj.gov 15 GUSTAV W. EYLER 16 Director TIMOTHY FINLEY 17 DANIEL ZYTNICK Trial Attorneys 18 U.S. Department of Justice Consumer Protection Branch 19 PO Box 386 Washington, DC 20044 20 IT IS SO ORDERED. (202) 307-0050 / (202) 598-8337 21 Timothy.T.Finley@usdoj.gov Dated this 1 day of April, 2022. Daniel.E.Zytnick@usdoj.gov 22 Attorneys for the United States 23 24 /s/ Richard Tanasi Gloria M. Navarro, District Judge RICHARD E. TANASI, ESQ. UNITED STATES DISTRICT COURT 25 Attorney for the Defendant Mario Castro 26